

JAP:AMC

**M-09-1257**

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA

TO BE FILED UNDER SEAL

- against -

COMPLAINT AND AFFIDAVIT  
IN SUPPORT OF APPLICATION  
FOR ARREST WARRANT

WHAAB BOLA OLAWAPO,  
also known as  
"Bola Olanrewaju Yusuff"  
and "Benson Bolare"

(T. 18, U.S.C., 1542)

Defendant.

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EASTERN DISTRICT OF NEW YORK, SS:

GEORGE IOANNIDIS, being duly sworn, deposes and states that he is a Special Agent with Immigration and Customs Enforcement, Office of Investigations, duly appointed according to law and acting as such.

On or about January 30, 2006, within the Eastern District of New York, the defendant, WHAAB BOLA OLAWAPO, also known as "Bola Olanrewaju Yusuff" and "Benson Bolare" did knowingly and willfully use and attempt to use a passport the issue of which was secured in any way by reason of any false statement.

(Title 18, United States Code, Section 1542).

The source of your deponent's information and the grounds for his belief are as follows:<sup>1/</sup>

1. I am a Special Agent with the Immigration and Customs Enforcement ("ICE"), Office of Investigation. I am familiar with the facts and circumstances set forth below from my participation in the investigation, my review of the investigative file, and from reports of other law enforcement officers involved in the investigation.

2. On January 30, 2006, the defendant, WHAAB BOLA OLAWAPO, also known as "Bola Olanrewaju Yusuff" and "Benson Bolare" arrived at John F. Kennedy International Airport, in Queens, New York aboard Virgin Atlantic Airways Flight 009 from London, England. The defendant presented to Customs and Border Patrol ("CBP") United States passport number 094282844 in the name of "Bola Olanrewaju Yusuff." During a secondary inspection by CBP, WHAAB BOLA OLAWAPO's fingerprints were taken.

3. A subsequent investigation revealed that the fingerprints taken from OLAWAPO on January 30, 2006 did not match the fingerprints used to identify OLAWAPO during his citizenship application in 1988. Thus, OLAWAPO, who identified himself as "Bola Olanrewaju Yusuff" to CBP officers on January 30, 2006, had

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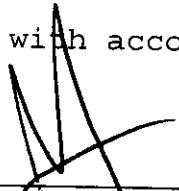
<sup>1/</sup> Because the purpose of this Complaint is to set forth only those facts necessary to establish probable cause to arrest, I have not described all the relevant facts and circumstances of which I am aware.

previously obtained his citizenship on April 16, 1998 by using a false set of fingerprints to conceal his true identity, believed to be "Whaab Bola Olawepo."

4. Prior to obtaining United States citizenship in the name of "Bola Olanrewaju Yusuff," OLAWIPO had been ordered excluded during a previous attempt to gain Lawful Permanent Resident ("LPR") status on March 9, 1987. OLAWIPO had applied for LPR status under the name "Whaab Bola Olawepo." And prior to that, in June 1992, OLAWIPO was ordered removed from the United States because he had been convicted of felony credit card fraud in Virginia. When OLAWIPO was arrested in Virginia he provided the name "Benson Bolare."

5. The fingerprints taken from OLAWIPO's 1987 LPR application match the fingerprints taken from OLAWIPO's 1992 arrest for credit card fraud, and also match the fingerprints taken when OLAWIPO entered the country on January 30, 2006.

WHEREFORE, your deponent respectfully requests that the defendant WHAAB BOLA OLAWIPO, also known as "Bola Olanrewaju Yusuff" and "Benson Bolare" be dealt with according to law.

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GEORGE IOANNIDIS  
Special Agent  
Immigration and Customs Enforcement

Sworn to before me this  
22nd day of December, 2009

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UNITED STATES MAGISTRATE JUDGE  
EASTERN DISTRICT OF NEW YORK